

FILED

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA

FEB 13 2024

UNITED STATES OF AMERICA,

Plaintiff,
v.

JORDAN FRANCIS TOYNE,
Defendant.

SEALED

By BONNIE HACKLER
Clerk, U.S. District Court

Deputy Clerk

Case No. 24 CR - 24 RAW

INDICTMENT

The Federal Grand Jury charges:

COUNT ONE

SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY
[18 U.S.C. §§ 2243(a), 2246(2)(A), 1151, & 1152]

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: penetration, however slight, between the penis of the defendant and the vulva of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a) & 2246(2)(A), 1151, & 1152.

COUNT TWO

SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY
[18 U.S.C. §§ 2243(a), 2246(2)(B), 1151, & 1152]

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-

Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: contact between the mouth of the defendant and the vagina of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, in violation of Title 18, United States Code, Sections 2243(a), 2246(2)(B), 1151, and 1152.

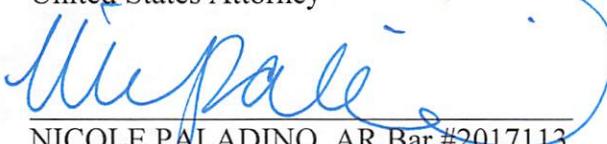
COUNT THREE

SEXUAL ABUSE OF A MINOR IN INDIAN COUNTRY
[18 U.S.C. §§ 2243(a), 2246(2)(D), 1151, & 1152]

Between in or about January, 2019, and in or about October, 2022, within the Eastern District of Oklahoma, in Indian country, the defendant, **JORDAN FRANCIS TOYNE**, a non-Indian, did knowingly engage and attempt to engage in a sexual act as defined in Title 18, United States Code, Section 2246, to wit: the intentional touching, not through the clothing, of the genitalia of Victim, an Indian, who had attained the age of 12 years, but had not attained the age of 16 years, and who was at least four years younger than the defendant, with the intent to abuse, humiliate, harass, degrade, and arouse and gratify the sexual desire of any person, in violation of Title 18, United States Code, Sections 2243(a), 2246(2)(D), 1151, and 1152.

A TRUE BILL:

CHRISTOPHER J. WILSON
United States Attorney


NICOLE PALADINO, AR Bar #2017113
Assistant United States Attorney

Pursuant to the E-Government Act,
the original indictment has been filed
under seal in the Clerk's Office.

s / Foreperson
FOREPERSON OF THE GRAND JURY